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September 18, 2019

*By ECF*

Honorable Alvin K. Hellerstein  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *United States v. David Wagner and Marc Lawrence*, 19 Cr. 437 (AKH)

Dear Judge Hellerstein:

I write on consent (Assistant U.S. Attorney Jilan Kamal and Mr. Lawrence's counsel, Andrew M. St. Laurent) to respectfully request that the Court adjourn the conference currently scheduled for September 26, 2019, at 11:00 a.m. for a period of around 60 days. The reason for the request is that the discovery in this case is extremely voluminous (with over 350,000 pages of documents), and I need additional time to review it before being in a position to inform the Court whether there are pre-trial motions to be filed. Both defendants in this case are out on bail.

If the Court grants the adjournment, I respectfully request (again on consent) that the Court exclude time under the Speedy Trial Act until the next conference date.

Respectfully submitted,

/s/  
Martin Cohen  
Assistant Federal Defender  
(212) 417-8737

cc.: Jilan Kamal, Esq., by ECF  
Sagar Ravi, Esq., by ECF  
Andrew M. St. Laurent, by ECF